

## REMARKS

Claims 1 through 27 are in the application, with Claims 11 through 27 having been withdrawn. Of the claims under consideration (i.e., Claims 1 through 10), Claims 1 and 7 are independent and have been amended. No new matter has been added. Reconsideration and further examination are respectfully requested.

Claims 1 through 5 and 7 through 9 have been rejected as allegedly being anticipated by U.S. Patent No. 6,803,659 ("Suwa"); and Claims 6 and 10 have been rejected under 35 U.S.C. § 103 as unpatentable over Suwa in view of U.S. Patent No. 5,929,627 ("MacPherson"). Reconsideration and withdrawal of the rejections are respectfully requested.

### Claim 1

Amended independent Claim 1 concerns a device including a power plane, the power plane comprising a power pad to receive a first terminal of a circuit element, and a ground pad to receive a second terminal of a circuit element. The device further includes a trace substantially coplanar with the ground pad, electrically coupled to the ground pad, and extending from the ground pad, a via area substantially coplanar with the ground pad, separated from the ground pad, and electrically coupled to the trace, a ground plane, and a via to electrically couple the via area to the ground plane.

None of the art of record is seen to disclose or to suggest the foregoing features of amended independent Claim 1. More specifically, none of the art of record is seen to disclose or to suggest a trace that is substantially coplanar with a ground pad to receive a terminal of a circuit element, electrically coupled to the ground pad, and extending from the ground pad, a via area that is substantially coplanar with the ground pad, separated from the ground pad, and electrically coupled to the trace, and a via to electrically couple the via area to a ground plane.

FIG. 2 of Suwa shows a conventional ground pad /via/ground plane arrangement in which a pad including Ground Wiring is directly coupled to a via, which is in turn coupled to a Ground Plane. Such an arrangement is demonstrated by the dotted line in FIG. 3 of the present application and referred to as "conventional" on page 5, lines 18 and 19. In contrast to this conventional arrangement, the embodiments of Claim 1 shown in FIGS. 2 through 4 of the present application include a trace (e.g. 309) that is substantially coplanar with a ground pad

(e.g., 306) to receive a terminal (e.g., 312), electrically coupled to the ground pad, and extending from the ground pad. Also shown are a via area (e.g., 308) that is substantially coplanar with the ground pad, separated from the ground pad, and electrically coupled to the trace, and a via (e.g., 318) to electrically couple the via area to a ground plane (e.g., 316).

Nowhere is Suwa seen to describe at least a trace that is substantially coplanar with a ground pad to receive a terminal of a circuit element, electrically coupled to the ground pad, and extending from the ground pad. Accordingly, Suwa cannot be seen to disclose or to suggest a via area that is substantially coplanar with the ground pad, separated from the ground pad, and electrically coupled to the trace, and a via to electrically couple the via area to a ground plane.

MacPherson is not seen to contain any disclosure that would remedy the foregoing deficiencies of Suwa. In particular, MacPherson fails to disclose or to suggest a trace that is substantially coplanar with a ground pad to receive a terminal of a circuit element, electrically coupled to the ground pad, and extending from the ground pad, a via area that is substantially coplanar with the ground pad, separated from the ground pad, and electrically coupled to the trace, and a via to electrically couple the via area to a ground plane.

Claim 1 and its dependent Claims 2 through 6 are believed to be in condition for allowance for at least the foregoing reasons, and withdrawal of the rejections thereof is respectfully requested.

Claim 7

Amended independent Claim 7 concerns a method including fabricating a ground plane, fabricating a via electrically coupled to the ground plane, and fabricating a ground pad to receive a first terminal of a circuit element, a trace substantially coplanar with the ground pad, electrically coupled to the ground pad, and extending from the ground pad, and a via area substantially coplanar with the ground pad, the via area electrically coupled to the via, separated from the ground pad, and electrically coupled to the trace. The method also includes fabricating a power plane, the power plane including a power pad to receive a first terminal of the circuit element.

The art of record is not seen to disclose or to suggest the foregoing features of amended independent Claim 7. The art of record is not seen to disclose or to suggest at least fabricating a

trace that is substantially coplanar with a ground pad, electrically coupled to the ground pad, and extending from the ground pad, a via area that is substantially coplanar with the ground pad, separated from the ground pad, and electrically coupled to the trace, and a via to electrically couple the via area to a ground plane.

As described above, Suwa describes a conventional arrangement in which a ground pad is directly coupled to a via, which is in turn coupled to a ground plane. In contrast, Claim 7 specifies the fabrication of a trace that is substantially coplanar with a ground pad, electrically coupled to the ground pad, and extending from the ground pad. Claim 7 also specifies, and Suwa fails to disclose or suggest, fabrication of a via area that is substantially coplanar with the ground pad, separated from the ground pad, and electrically coupled to the trace, and a via to electrically couple the via area to a ground plane. MacPherson has not been alleged and is not seen to disclose or suggest at least the foregoing features lacking in Suwa.

Claim 7 and its dependent Claims 8 through 10 are therefore believed to be in condition for allowance, and withdrawal of the rejections thereof is respectfully requested.

**C O N C L U S I O N**

In view of the above, Applicants respectfully request withdrawal of the outstanding rejections and allowance of the present application. Applicants' silence with respect to statements made in the Office Action but not addressed herein does not imply agreement with those statements. If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-0049.

Respectfully submitted,

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